

***United States Court of Appeals  
for the Second Circuit***



**SUPPLEMENTAL  
APPENDIX**



# 77-6092

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IN THE  
**United States Court of Appeals**  
FOR THE SECOND CIRCUIT

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SNEAKER CIRCUS, INC., BLAZER SPORTS INTERNATIONAL, INC., and BOB WOLF ASSOCIATES, INC.,

*Plaintiffs-Appellants,*

—against—

JIMMY CARTER, President of the United States, ROBERT S. STRAUSS, Special Representative for Trade Negotiations, STEPHEN J. LANDE, Deputy Special Representative for Trade Negotiations, and UNITED STATES INTERNATIONAL TRADE COMMISSION,

*Defendants-Appellees.*

**On Appeal From the United States District Court For the Eastern District of New York**

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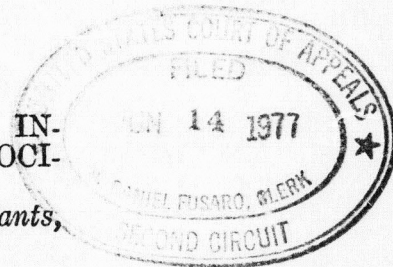
## SUPPLEMENTAL APPENDIX

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VINCENTI & SCHICKLER  
*Attorneys for Plaintiffs-Appellants*  
225 Broadway  
New York, N. Y. 10007

DAVID A. TRAGER  
United States Attorney for the Eastern  
District of New York  
225 Cadman Plaza East  
Brooklyn, N. Y. 11201

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If its argument were to be accepted, then the Congressional intent in granting exclusive jurisdiction to the Customs Court would be frustrated. The argument could always be made (especially at <sup>a similarly</sup> ~~the~~ premature stage of the proceedings) that the limits imposed by any quota - whether unilaterally imposed or negotiated - <sup>might</sup> ~~may~~ never be exceeded & therefore the Customs Court might ~~not~~ never have jurisdiction. ~~To create a~~  
~~loophole~~ If this argument

will  
~~was~~ sufficient to vest jurisdiction  
 in the district court, it would  
 create a loophole so large <sup>so</sup> that it would  
 entirely negate the Congressional  
 desire to create <sup>in the Customs Court</sup> a "complete  
 system of corrective justice  
 w/ respect to matters  
 arising under the customs  
 laws." J. C. Penney, supra at 65  
 citing Cott Cottman Co. v. Dailey,  
 94 F2 85, 88 (4th cir 1938).